

1046 72 15 1992


November 4, 1999

Jane Henney, Commissioner
Food and Drug Administration
5600 Fisher Lane
Room 1471
Rockville, MD 20857

Dear Jane Henney :

I write with respect to the case of The Alliance for Bio-Integrity v. Shalala, Docket Number 98-1300. I write as a citizen very concerned about the explosive growth of inadequately tested genetically engineered foods in the American marketplace. I very much support stronger safety testing and mandatory labelling of all genetically engineered food products.

Sincerely,



Lisa Heldke
1002 Riverview Hills South
St. Peter, MN 56082

C6268

92N-0139

Unlabeled, untested.. . and you're eating it.

In secret, genetically engineered foods are showing up on American grocery shelves. Though other countries now label biotech foods, the U.S. FDA still does not require labels or safety tests. Don't you have the right to know what's in your food? And if it's safe for your family?

You have the right to know if your baked potato contains bacteria genes. . . or if the tomato in your salad has genes of viruses spliced in. But at the very place where you encounter genetically engineered (GE) products-your local grocery store-there is silence.

The Food and Drug Administration (FDA) and the biotechnology industry have prevented the labeling of GE foods, effectively subverting your right to know! And so, **every** day, millions of American infants, children and adults eat genetically engineered foods without their knowledge.

Are these unlabeled foods dangerous? Nobody knows. The FDA **refuses** to require any safety testing of genetically engineered foods. This, despite the fact that there is significant scientific evidence that inserting novel genes into foods can sometimes create dangerous toxins. For example, this is the **possible** cause of the thousands of **illnesses**, and deaths from the GE food supplement **L-tryptophan** several years ago. Failure to require testing or labeling of GE foods has made millions of consumers into guinea pigs, unknowingly testing the safety of dozens of gene altered products.

Public opinion

There is no doubt of the public's views. Opinion polls consistently show that more than 90% of Americans support the labeling of genetically engineered foods. A 1999 Time poll revealed that close to 60% would avoid such foods if they were labeled. And last year more than 280,000 angry consumers protested the Clinton administration's proposal on organic food standards that would have allowed genetically engineered foods to be certified as "organic." Little wonder that the biotechnology industry is fighting to stop labeling. If consumers knew what was in these foods, there's a good chance they wouldn't buy them.

By its policy of "no labeling" of GE foods, the U.S. has become a rogue nation. The European Union has passed a law that requires labeling of genetically engineered foods. Meanwhile, Canada and the European Union have banned the use of genetically engineered bovine growth hormone (**rBGH**) in the production of milk and dairy products. But the Clinton administration, the FDA, and the biotech food companies continue to stonewall the American public.

. . .

To help overcome the government's irresponsible policy, we are **publishing** on this page a partial list of **foods** that have been genetically modified. Should you be concerned about genetically engineered foods? Yes, you should. According to documents recently released after a court order, even scientists from the

Food and Drug Administration have known of some potential hazards from the genetic engineering of foods, dating as far back as 1991.

The following is a list of several potential dangers from the genetic engineering of foods. While there have been no tests so far conclusively establishing that genetically **engineered** foods are harmful to humans, the potential dangers are significant enough to mandate long-term independent testing of GE **food** products before release into supermarkets.

Toxicity. According to some FDA scientists, the genetic engineering of food may bring “some undesirable effects such as increased levels of known naturally occurring toxicants, appearance of new, not previously **identified** toxicants, increased capability of concentrating toxic substances **from** the environment (e.g., pesticides or heavy metals), and undesirable alterations in the levels of nutrients.” In other words, scientists **from** the FDA itself suspect that genetic **engineering** could *make* foods toxic.

Allergic reaction FDA scientists also warn that genetically engineered foods could “produce a new protein allergen” or “enhance the **synthesis** of existing plant food allergens.” And a recent study in the New England Journal of **Medicine** showed that when a gene from a **Brazil** nut was **engineered** into soybeans, people allergic to nuts had serious reactions. Without labeling, people with certain food **allergies** will not be able to know **if they** might be harmed by the food they’re eating.

Antibiotic resistance. Many **GE** foods are **modified** with antibiotic **resistant** genes; people who eat them **may become** more susceptible to bacterial infections. Commenting on this problem, the British Medical Association said that antibiotic resistance is “one of the major public human health threats that will be faced in the 21st century.”

Cancer. European scientists have also found that dairy products **from** animals treated with bovine growth hormone (**rBGH**) contain an insulin-like growth factor that may increase the risk of breast cancer, as well as prostate and colon cancer.

Immune-suppression. Twenty two leading scientists recently declared that animal test results linking genetically engineered foods to immuno-suppression are valid.

Other concerns

Unlabeled genetically engineered foods pose more than just health threats. For millions of people, the consumption of GE foods may violate their religious and ethical principles. For example, vegetarians try to avoid all animal food; but without labeling they can’t be sure that animal genes have not been inserted into their vegetables. Jews and Muslims have rigid dietary laws against eating certain animals, yet their tomatoes or lettuce may one day contain pig genes. Don’t they have the right to know?

And what of the suffering of genetically altered animals? One GE “super pig” was unable to walk or stand. A GE “super salmon” had a monster head and couldn’t swim, eat, or breathe properly. There are hundreds of such outcomes.

There are still broader ethical concerns. More than two dozen genes **from** human beings have already been engineered into various animals. **If we** eat them, can we call it cannibalism?

Despite all these concerns, and many more, the government has decided it doesn’t want you to know what’s in the food you’re eating. Clearly, the reason is the constant pressure **from** the **biotech** food industry. The Clinton

administration seems incapable of resisting this pressure. But you can resist it. Don't let your children continue to be the guinea pigs in this experiment. Here are some things you can do.

What you can do

First, clip out the list of GE foods, take it with you to your supermarket and discuss it with the management. Second, buy certified organic foods, whenever possible. Third, support the movement demanding long-term independent safety testing and labeling of genetically engineered foods. Inquire with the organizations below about participating in legal actions, petitioning of public officials, and public protests. For more information, please call us at the number below.

PARTIAL LIST OF GENETICALLY ENGINEERED FOODS

This is a list of processed foods that tested positive for genetically engineered ingredients (September 1999). These tests were not "safety" tests; they were only to establish the presence of unlabeled genetically engineered ingredients.

- Frito-Lay Fritos Corn Chips
- Bravos Tortilla Chips
- Kellogg's Corn Flakes
- General Mills Total Corn Flakes Cereal
- Post Blueberry Morning Cereal
- Heinz 2 Baby Cereal
- Enfamil ProSobee Soy Formula
- Similac Isomil Soy Formula
- Nestle Carnation Alsoy Infant Formula
- Quaker Chewy Granola Bars
- Nabisco Snackwell's Granola Bars
- Ball Park Franks
- Duncan Hines Cake Mix
- Quick Loaf Bread Mix
- Ultra Slim Fast
- Quaker Yellow Corn Meal
- Light Life Gimme Lean
- Aunt Jemima Pancake Mix
- Alpo Dry Pet Food
- Gardenburger Hamburger Style
- Boca Burger Chef Max's Favorite
- Morning Star Farms Better'n Burgers
- Green Giant Harvest Burgers (now called Morningstar Farms)
- McDonald's McVeggie Burgers
- Ovaltine Malt Powdered Beverage Mix
- Betty Crocker Bac-Os Bacon Flavor Bits
- Old El Paso Taco Shells
- Jiffy Corn Muffin Mix

Sources: Genetic ID (an independent testing firm) and Consumer Reports (September 1999).

By December 1998, the U.S. government had approved the commercial **sale** of genetically engineered varieties of the following **whole foods**. **No** labeling or long-term **safety** tests were required. (According to The New York Times, about half of all soybeans and a third of all corn planted this year in the U.S. were genetically **engineered**.)

- **Canola (oilseed rape)**
- **Radicchio (Radicchio)**
- **Corn**
- **Papaya**
- **Potato**
- **Soybean**
- **Squash**

Source: Union of Concerned Scientists

A high percentage of the following ingredients have been made **from genetically** engineered plants, and are commonly found in processed foods.

- **Soy flour**
- **Soy oil**
- **Soy protein isolates and concentrates**
- **Corn flour**
- **Corn starch**
- **Corn oil**
- **Corn sweeteners & syrups**
- **Cottonseed oil**
- **Canola oil**

Center for Food Safety
 Foundation on Economic Trends
 Food First / Institute for Food & Development Policy
 Greenpeace USA
 Friends of the Earth
 Council for Responsible Genetics
 International Center for Technology Assessment
 Organic Consumers Association
 Institute for Agriculture & Trade Policy
 Mothers for Natural Law
 Sierra Club
 Consumer's Choice Council
 Edmonds Institute

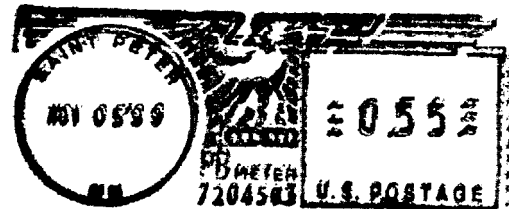
Food & Water
International Forum on Food and Agriculture
Pesticide Action Network
Rural Vermont
U.S. **Public** Interest Research Group
Center for Ethics and **Toxics**
Council of Canadians
Mothers & Others for a Livable planet
International Society for Ecology and Culture

Signers are all part of a **coalition** of more than 60 **non-profit** organizations that favor democratic, **localized**, ecologically sound **alternatives** to current practices and policies. This advertisement is **#2** in the Genetic **Engineering** series. Other ad series discuss the extinction crisis, economic globalization, industrial agriculture and megatechnology. For more information, please contact:

Turning Point Project, 310 D St NE, Washington, DC 20002
14004494712 • www.turnpoint.org • email: info@turnpoint.org



Lisa Heldke
Dept of Philosophy
GAC
Saint Peter MN 56082



Jane Henney
Commissioner
FDA
5600 Fisher Lane, Rm 1471
Rockville, MD ~~20855~~ 20857